## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

This document relates to:

The County of Cuyahoga v. Purdue Pharma L.P., Case No. 17-OP-45005 (N.D. Ohio) and City of Cleveland v. AmerisourceBergen Drug Corp., Case No. 18-OP-45132 (N.D. Ohio)

MDL No. 2804

Case No. 1:17-md-2804

Hon. Dan Aaron Polster

## ENDO'S MOTION FOR LEAVE TO EXCEED THE 15-PAGE LIMITATION FOR ITS MOTION TO RECONSIDER DISQUALIFICATION OR, IN THE ALTERNATIVE, TO CERTIFY THE DISQUALIFICATION ORDER FOR INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(b)

Pursuant to Local Rule 7.1(f), Endo Pharmaceuticals Inc. and Endo Health Solutions Inc. (hereinafter "Endo"), respectfully move this Court for leave to file a memorandum in excess of the 15-page limitation for its Motion to Reconsider Disqualification Or, In the Alternative, to Certify the Disqualification Order for Interlocutory Appeal Under 28 U.S.C. § 1292(b). Endo requests leave to submit a brief of no more than 26 pages.

Endo submits that this request is reasonable, in light of the extraordinary circumstances of this matter. On March 20, 2019, this Court entered an order disqualifying Carole Rendon and BakerHostetler from representing Endo in the City of Cleveland and Cuyahoga County cases. (the "Order"). Dkt. No 1458. This Order has substantial implications, including for Endo's representation in one of the Track One cases and potentially for the Oct. 21, 2019 trial. For the sake of judicial economy, Endo has combined two separate motions about this Order into one brief—its motion for reconsideration and its motion to certify the disqualification order for interlocutory appeal. Understandably, this omnibus brief is longer than 15 pages, given the complexity of the legal issues at stake.

Good cause therefore exists for this Court to grant leave to Endo to exceed the page limit set forth in Local Rule 7.1(f). Endo respectfully requests that this Court grant its approval.

DATED: March 29, 2019 /s/ John D. Parker

John D. Parker (0025770)
Carole S. Rendon (0070345)
Tera N. Coleman (0090544)
BAKER & HOSTETLER LLP
Key Tower
127 Public Square, Suite 2000
Cleveland, OH 44114-1214
(216) 621-0200
jparker@bakerlaw.com
crendon@bakerlaw.com

Jonathan L. Stern ARNOLD & PORTER KAYE SCHOLER LLP 601 Massachusetts Ave., NW Washington, DC 20001-3743 (202) 942-5000 Jonathan.Stern@arnoldporter.com

Sean Morris
ARNOLD & PORTER KAYE SCHOLER LLP
777 S. Figueroa Street
44th Floor
Los Angeles, CA 90017
(213) 243-4000
Sean.Morris@arnoldporter.com

Attorneys for Defendants
ENDO PHARMACEUTICALS INC. and ENDO
HEALTH SOLUTIONS INC.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 29, 2019, the foregoing was filed electronically with the Clerk of Court using the Court's CM/ECF system and will be served via the Court's CM/ECF filing system on all attorneys of record.

DATED: March 29, 2019

/s/ John D. Parker

John D. Parker